

# EXHIBIT A

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**From:** [Robinson, Amy \(LAW\)](#)  
**To:** [Payne Litigation Team](#); [Sow-Legal](#); [Andrew Stoll](#); [Wood](#); [AG-NYPDLitigation](#); [Hernandez Team](#); [GrayLegalTeam@dwt.com](#)  
**Cc:** [Weiss, Dara \(Law\)](#); [Nelson, Genevieve \(Law\)](#); [Weng, Jenny \(Law\)](#)  
**Subject:** Deposition Schedule  
**Date:** Friday, January 21, 2022 6:53:23 PM  
**Attachments:** [Deposition Schedule\\_1-21-22.pdf](#)  
[Deposition Topic List\\_1-21-22.pdf](#)

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Counsel,

Please see attached deposition schedule and chart of witnesses per topic.

First, given the 2-day requirement for many witnesses, we cannot fit into the schedule all of the witnesses before the April 22<sup>nd</sup> deadline without double and triple tracking, which we know plaintiffs want to avoid. Both sides need an extension of the deadline.

Second, we are seeking to designate one of the fact witnesses as a 30(b)(6) witness, but this witness is retired, and we were not able to confirm their consent to be so designated by today. We expect to have that confirmation shortly.

Regards,

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**From:** Amy Robinson <[arobinso58@nyc.rr.com](mailto:arobinso58@nyc.rr.com)>  
**Sent:** Friday, January 21, 2022 6:43 PM  
**To:** Robinson, Amy (LAW) <[arobinso@law.nyc.gov](mailto:arobinso@law.nyc.gov)>  
**Subject:** [EXTERNAL] Emailing: Depostion Schedule\_1-21-22, Depostion Topic List\_1-21-22

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[Deposition Schedule\\_1-21-22](#)  
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**IN RE: NEW YORK CITY POLICING SUMMER 2020 DEMONSTRATIONS**  
**HIGH-RANKING/30(b)(6) DEPOSITION TOPICS**

<b>TOPIC</b>	<b>WITNESS</b>
1	Michael Baker
6	Stephen Hughes
7	Dean Fuleihan
8	Various Identified 30(b)(6) Witnesses
9	Gerard Dowling/David Miller/Carrie Talansky
10	Gerard Dowling/David Miller
11	James Khan
12	Thomas Galati
13	Edward Mullane/Gerard Dowling/Carrie Talansky
14	Carrie Talansky/Christopher Czark
15	Carrie Talansky/Stephen Hughes
16	Gerard Dowling/David Miller
17	Lauren Foster
18	Lauren Foster
19	Michael Baker
20	John Kanganis
21	John Kanganis
22	Michael Baker